REMARKS/ARGUMENTS

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claims 1-10, 12-21, 23-31, 33-50, 52-60, 63-71, and 73-85 have been amended solely for clarity. Thus, claims 1-10, 12-21, 23-31, 33-50, 52-61, 63-71, and 73-85 are pending for further examination.

Rejection under 35 U.S.C. § 101

Claims 1-10, 12,21, 23-31, 33-45, 52-60, and 81-85 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. This rejection is respectfully traversed for at least the following reasons.

The Office Action alleges that claims 1, 21, 41, and 81 "are merely a thought or an abstract idea. They are not tied to a statutory class. They appear can be [sic] performed as mental steps." Without acquiescing to the propriety of the rejection and these allegations, Applicant has amended independent claims 1, 21, 41, and 81 so as to yet more clearly indicate that these claims are directed to methods that are practiced by having a computer execute instructions tangibly stored on a computer readable storage medium. The claims clearly are tied to a method, do not involve mere thoughts or abstract ideas, and certainly cannot be performed as mental steps. Moreover, the claims clearly pass the Federal Circuit's new "machine or transformation" test, presented in *In re Bilski*, as each of claims 1, 21, 41, and 81 are tied to a particular bug tracking system that is accessible or otherwise uses an Internet browser and results in transformations to the underlying bug tracking system. Thus, Applicant respectfully submits that the claims are in full compliance with the requirements of Section 101. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested. Should any minor

matters of form remain to be solved regarding the subject-matter eligibility requirements of the claims, the Examiner is invited to contact the undersigned attorney at the telephone number below to resolve these minor matters.

Claim Objection

Claim 77 has been amended to remove the double periods in response to the Examiner's suggestion. Thus, reconsideration and withdrawal of this objection are respectfully requested.

Rejection under 35 U.S.C. § 112, Second Paragraph

Claims 2-10, 12-20, 23-31, 33-40, 42-50, 52-60, 63-71, 73-80, and 82-85 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Apparently, there is some issue with the fact that these dependent claims starts with "a" rather than "the." Without acquiescing to the propriety of the rejection, Applicant has amended these claims in the manner suggested in the Office Action -- although it is noted that the claims were clear and definite and in full compliance with the requirements of Section 112, second paragraph prior to this minor amendment as to form. In any event, reconsideration and withdrawal of this rejection are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-8, 14-16, 18-21, 23-29, 35-37, 39-46, 48, 54-56, 58-60, and 81-85 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wygodny et al. (U.S.

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Patent No. 6,282,701) in view of Haswell et al. (U.S. Patent No. 6,701,514). This rejection is respectfully traversed for at least the following reasons.

In contrast to the previous (though now withdrawn) rejection that used Wygodny as the secondary reference, the Office Action now uses Wygodny as the primary reference in this § 103 rejection. The Office Action admits, however, that Wygodny "does not explicitly discloses [sic] processing user identification information including the password; and providing, in response to said user identification information, the contents of which vary based on the user's role in the software development process." The Office Action introduces Haswell to make up for this admitted deficiency with respect to Wygodny. Haswell is a voluminous work, which relates to techniques for test maintenance in an automated scripting framework. However, Applicant respectfully submits that Haswell fails to make up for the admitted fundamental deficiencies of Wygodny. Thus, the alleged Wygodny/Haswell combination, even if appropriate (which Applicant does not admit), fails to render obvious claims 1, 21, 41, 61, and 81 (and their respective dependents).

The Office Action cites to several different portions of Haswell as allegedly disclosing the above-noted feature that the admittedly is absent from Wygodny. The Office Action first cites to col. 25 and, more particularly, to the section that begins the "USER FRAMEWORK DESIGN" portion of Haswell. Applicant notes, however, that this portion of Haswell appears to relate to the implemented software application -- not the debugging of the software application in development. Indeed, as cols. 25-26 make clear, the user roles are related to the actual end-user roles used during implementation including, for example, a customer, a manager, and an employee. The customization is related to what these end-users might see including, for example, a local currency, a particular language, etc. Again, this portion of Haswell is silent

regarding "at least one bug tracking related menu, the contents of which vary based on the user's role in the software development process." Indeed, this user is the end-user, not a person involved in the development of the software. Thus, although the cited portion does arguably suggests tailoring a single interface based on information associated with a user in a broad context, it does not do so in the context of bug tracking or software development. Accordingly, this first cited portion of Haswell is unrelated to the claims and fails to make up for the deficiencies of Wygodny.

The Office Action next cites to cols. 54-56 of Haswell. These portions of Haswell appear to describe "migration control." Migration control tools, according to Haswell, control multiple versions of source code, data, and other items as they are changed, tested, and moved from one development environment into another. In connection with this particular disclosure, Haswell describes certain example test stages that are involved in migration. However, Haswell simply does not describe "providing, in response to said user identification information, at least one bug tracking related menu, the contents of which vary based on the user's role in the software development process." In other words, although Haswell describes multiple stages used in migration, it does not disclose any bug tracking related menus at all in this portion, much less varying the content of any such bug tracking related menus. Once again, this cited portion of Haswell is unrelated to the claims and fails to make up for the deficiencies of Wygodny.

Finally, the Office Action cites to the table bridging cols. 49-50 of Haswell. This table provides a list of the active participants within a change control process. As noted at col. 49, a person may have more than one role and responsibility. Although the table lists a number of different titles and describes their roles and responsibilities, it does not at all relate to the display of a bug tracking related menu, or varying the contents of such a menu based on the user's role.

Thus, while the table may describe multiple roles, it does not describe translating these roles into anything involved in the display of a bug tracking related menu. Furthermore, as made clear in the change control section that begins at the bottom of col. 50, although a change is tracked with respect to what, why, when, and who made a change, such information is never displayed to a user based on that user's role in the software development process. In other words, although a database of changes is maintained so that the changes may be tracked, access to this database, and display of the information stored therein, does not depend on a particular user's role in the software development process. Thus, even this final cited portion of Haswell is unrelated to the claims and fails to make up for the deficiencies of Wygodny.

As shown above, the Office Action has not pointed to any particular portions of Haswell that make up for the admitted deficiency of Wygodny. Although Haswell discloses a list of different roles and a list of different end-user roles that arguably do affect the display of the information on a common screen, such does not teach or suggest the final limitation of claim 1. The introduction of Johndrew (U.S. Publication No. 2001/0049697) and Applicant's Admitted Prior Art (APA) also fail to make up for this deficiency of the alleged combination of Wygodny and Haswell.

The remaining independent claims (i.e., claims 21, 41, 61, and 81) include similar features to those discussed above with respect to claim 1. Thus, these claims should be allowable for substantially the same reason as those discussed above with reference to claim 1. Furthermore, the remaining independent claims add further distinguishing features to these features of claim 1. For example, claim 21 requires "transmitting at least the edited bug related information via the internet to a second user having a second role different from the first role in

developing said software package." At least this additional feature is not taught or suggested by the alleged combination of Wygodny and Haswell.
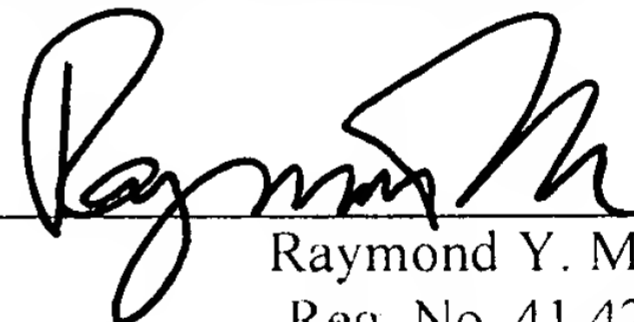
In view of the above, reconsideration and withdrawal of all outstanding Section 103 rejections are respectfully requested.

Conclusion

In view of the foregoing amendments and remarks, withdrawal of the rejections and allowance of this application are earnestly solicited. Should the Examiner have any questions regarding this application, or deem that any formalities need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

Respectfully submitted,

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